

United States Bankruptcy Court
Northern District of Illinois, Eastern Division

IN RE: Jeffrey Gemini)	Chapter 13
Michelle Christine Gemini)	Case No. 19 B 09205
Debtor(s))	Judge LaShonda A. Hunt

Notice of Motion

Jeffrey Gemini
Michelle Christine Gemini
1315 Cumberland Cir W
Elk Grove Village, IL 60007

Debtor Attorney: Geraci Law L.L.C.
via Clerk's ECF noticing procedures

On July 01, 2019 at 10:30 am, I will appear at the location listed to the right, and present this motion.

> Dirksen Federal Building
> 219 South Dearborn
> Courtroom 719
> Chicago, IL 60604

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Thursday, May 23, 2019.

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE

Motion to Dismiss Case For Unreasonable Delay

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, as Debtor(s) failed to file the required documents pursuant to 11 USC §521, §1307, §349, and Rule 3015, and in support thereof states the following:

1. Debtor(s) filed for Chapter 13 on 03/29/2019.
2. The debtor(s) have failed to provide to the Trustee a copy of the Federal income tax return (or transcript thereof) for the four years preceding the filing of the petition.
3. The debtor(s) have failed to address the proof of claim filed by the Internal Revenue Service regarding unfiled tax returns for tax year(s) 2018.
4. The debtor(s) have failed to resolve the pending objection(s) to the plan.
5. The Debtor has failed to address the Illinois Department of Revenue's proof of claim for 2018.
6. The debtor's failure to confirm a plan in a timely manner constitutes unreasonable delay.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this court deems just and proper.

Office of the Chapter 13 Trustee
224 S Michigan Ave
Ste 800
Chicago, IL 60604
(312) 431-1300

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE